

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE SOUTHERN DISTRICT OF MISSISSIPPI

IN THE MATTER OF:

CHAPTER 13 NO.:

CAROLYN F. BLANSETT AND
BERNARDO BLANSETT

18-00241 - JAW

TRUSTEE'S NOTICE AND MOTION TO MODIFY

COMES NOW Harold J. Barkley, Jr, the duly appointed and qualified Standing Trustee in the above cause and moves to modify the above proceeding for reasons to be shown below.

1. The Debtors' Chapter 13 Plan was confirmed by Order of this Court entered on June 27, 2018, said plan being for a period of 60 months with 0% to unsecured creditors.

2. That, Creditor U.S. Bank Trust National Association, not in its individual capacity, but solely Fay Servicing, LLC has filed a Notice of Post-Petition Mortgage Fees, Expenses and Charges ("doc" under Claim Number 11-1) in the amount of \$1,397.00 for Insurance Advances incurred July 22, 2021.

3. Therefore, the Debtors' plan should be modified to pay U.S. Bank Trust National Association the Post-petition Mortgage Fees, Expenses, and Charges in the amount of \$1,397.00 for Insurance Advances incurred July 22, 2021 over the life of the Debtors' plan.

4. That, the Debtors' wage deduction order should be amended as necessary to comply with the terms of this Motion.

5. **You are hereby notified** that all Objections must be made in writing to the Clerk of this Court. Attorneys and Registered Users of the Electronic Case Filing (ECF) system should file any response using ECF. Others should file any response at U. S. Bankruptcy Court, U. S. Courthouse, 501 East Court Street, Suite 2.300, Jackson, MS 39201, with a copy mailed to the Trustee at the address below.

6. **You are further notified** that all Objections must be made within thirty (30) days of this date, being **September 10, 2021.**

7. **You are further notified** that should no Objection be timely filed, the Court will be requested to enter an Order ex parte.

8. Other grounds to be shown at a hearing hereon.

WHEREFORE, PREMISES CONSIDERED, Trustee prays that this motion be received and filed, and at a hearing hereon this Honorable Court will enter its Order sustaining Trustee's Motion

to Modify, and for such other, further and general relief to which the Trustee and this bankrupt estate may be entitled.

Dated: August 11, 2021

Respectfully submitted,

/s/ Harold J. Barkley, Jr.

HAROLD J. BARKLEY, JR. – MSB #2008
CHAPTER 13 TRUSTEE
POST OFFICE BOX 4476
JACKSON, MS 39296-4476
PHONE: 601-362-6161 / FAX: 601-362-8826
E-MAIL: HJB@HBARKLEY13.COM

CERTIFICATE

I, Harold J. Barkley, Jr., Trustee, do hereby certify that I have this date mailed a true and correct copy of the foregoing pleading to the following parties by United States Mail, postage prepaid or by ECF Filing Notification:

Office of the U.S. Trustee
Ustregion05.ja.ecf@usdoj.gov

Hon. Richard R. Grindstaff
grindstaf@yahoo.com

Bernardo Blansett
Carolyn F. Blansett
229 Maple Street
Florence, MS 39073

Caliber Home Loans
13801 Wireless Way
Oklahoma City, OK 73134

Caliber Home Loans
PO Box 24330
Oklahoma City, OK 73124

Fay Servicing, LLC
PO Box 814609
Dallas, TX 75381-4609

Bradley P. Jones
msbankruptcy@logs.com

Dated: August 11, 2021

/s/ Harold J. Barkley, Jr.
HAROLD J. BARKLEY, JR.